

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

In Re: **WALTER THOMAS ELLERBE**
Debtors.

Case No: 12-34620
Chapter 13

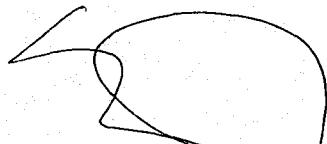
OBJECTION TO PROOF OF CLAIM
OF MARY JO WILFONG

COMES NOW the debtor(s), by counsel, and hereby object(s) to the proof of claim numbered 2-1 filed for Mary Joe Wilfong for the reasons set forth herein:

1. The aforementioned proof of claim is filed as a priority claim in the amount of \$12,148.00 for municipal taxes on several vehicles.
2. According to the supporting documentation filed with the aforementioned proof of claim, the \$12,148.00 comprises principal and interests due on a civil judgment awarded to the creditor for personal services rendered to the debtor prior to filing of the Chapter 13 bankruptcy case.
3. The debtor states that no basis exists for this claim to be treated as a priority claim and that it is a wholly unsecured non-priority debt and must be treated as a wholly unsecured non-priority claim in the debtors Chapter 13 Plan.

WHEREFORE, your debtors pray that this Court disallow Proof of Claim No. 2-1, for Mary Joe Wolfong as filed, with leave to amend, and to grant any further relief as may seem just and fitting.

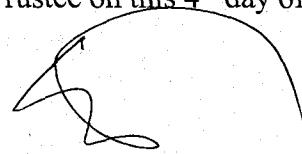
WALTER THOMAS ELLERBE,

By 
Steve C. Taylor, Esq.
Counsel for Debtor(s)

STEVE C. TAYLOR, P.C.
133 MT. PLEASANT RD.
CHESAPEAKE, VA 23322
(757) 482-5705
VSB 31174

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was mailed to: Mary Joe Wilfong, at 5200 Hampton Blvd., Norfolk, VA 23508, electronically to the Office of the U.S. Trustee, and Chapter 13 Trustee on this 4th day of September, 2012.



Steve C. Taylor

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NOTICE OF OBJECTION TO CLAIM

The Debtors have filed papers with the Court objecting to your claim.

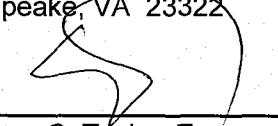
Your rights may be affected. You should read these papers carefully and discuss them with your Attorney, if you have one in this case. (If you do not have an Attorney, you may wish to consult one.)

If you do not want the Court to grant the Relief requested, or if you want the Court to consider your views on the Motion then, you or your Attorney must file with the Court, at the address shown below, a written response pursuant to Local Bankruptcy Rules 9013-1(H) on or before 9/25/2012. If you mail your response to the Court for filing.

Clerk of Court
United States Bankruptcy Court
600 Granby St., 4th Fl.
Norfolk, VA 23510

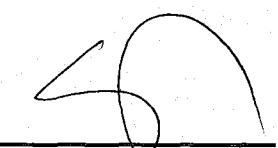
You must also mail a copy to:
Steve C. Taylor, Esquire
Law Offices of Steve C. Taylor, P.C.
133 Mount Pleasant Road
Chesapeake, VA 23322

Date: September 4, 2012


Steve C. Taylor, Esq.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was mailed to: Mary Joe Wilfong, at 5200 Hampton Blvd., Norfolk, VA 23508, electronically to the Office of the U.S. Trustee, Chapter 13 Trustee and the debtors via U.S. Mail


Steve C. Taylor